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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION
CHARLENE CARTER)
)
) CIVIL ACTION NO.
VS.) 3:17-CV-02278-X
)
SOUTHWEST AIRLINES CO., AND)
TRANSPORT WORKERS UNION OF)
AMERICA, LOCAL 556)

CONFIDENTIAL
TWU LOCAL 556 30(b)(6)
ORAL DEPOSITION OF
AUDREY STONE
NOVEMBER 30, 2020

ANSWERS AND DEPOSITION OF AUDREY STONE,
produced as a witness at the instance of the
Plaintiff, taken in the above-styled and -numbered
cause on NOVEMBER 30, 2020, at 9:00 a.m., before
CHARIS M. HENDRICK, a Certified Shorthand Reporter
in and for the State of Texas, witness located in
Orting, Washington, pursuant to the Federal Rules
of Civil Procedure, the current emergency order
regarding the COVID-19 State of Disaster, and the
provisions stated on the record or attached hereto.

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24 ALSO PRESENT: MS. CHARLENE CARTER
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25

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1 PROCEEDINGS
2 THE REPORTER: Today's date is
3 November 30, 2020. The time is 9:00 a.m. Central
4 Standard Time. This is the oral deposition of
5 Audrey Stone, and it is being conducted remotely in
6 accordance with the current emergency order
7 regarding the COVID-19 State of Disaster. The
8 witness is located in Orting, Washington and
9 counsel has agreed that I can swear her in out of
10 state.
11 My name is Charis Hendrick, Court
12 Reporter, CSR No. 3469. I am administering the
13 oath and reporting the deposition remotely by
14 stenographic means from my home in Ellis County,
15 Texas. The witness has been identified to me
16 through counsel.
17 Would counsel please state their
18 appearances and locations for the record? And the
19 city is fine.
20 MR. GILLIAM: Matthew B. Gilliam for
21 plaintiff Charlene Carter in Springfield, Virginia.
22 MR. GREENFIELD: Adam Greenfield on
23 behalf of Transportation Workers Union Local 556 on
24 behalf of the union. And just for the record, this
25 is a Rule 30(b)(6) deposition and Ms. Stone is

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1 being designated for certain topics. It's not
2 specifically her deposition.
3 MR. CORRELL: Michael Correll for the
4 defendant Southwest Airlines.
5 MR. CLOUTMAN: Sorry, Mike. And this
6 is Ed Cloutman also for TWU Local 556, Dallas,
7 Texas.
8 MR. GILLESPIE: And this is Joseph
9 Gillespie on behalf of the witness, Audrey Stone.
10 AUDREY STONE,
11 having been first duly sworn, testified as follows:
12 EXAMINATION
13 BY MR. GILLIAM:
14 Q. Good morning, Ms. Stone. As
15 Mr. Greenfield stated, this is a Rule 30(b)(6)
16 deposition of Transport Workers Union of America
17 Local 556; and that's your understanding as well?
18 A. Yes.
19 Q. Okay. And you are the designated
20 representative of Local 556, correct?
21 A. Yes.
22 Q. Okay. And if I say Local 556 or the
23 union, you understand that I mean Transport Workers
24 Union of America Local 556?
25 A. Yes.

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1 Q. Okay. And because this is a Rule 30(b)(6)
2 deposition, do you understand that you are speaking
3 on behalf of Local 556 and not on your personal
4 behalf?
5 A. Yes, I do.
6 Q. Okay. And you understand that you are
7 also speaking on the knowledge or potentially being
8 briefed on the collective knowledge on local -- of
9 Local 556, correct?
10 A. Yes.
11 Q. Okay. And you are okay with that?
12 A. Yes.
13 Q. Okay. And if I ask you a question that
14 you feel you haven't been briefed for or you don't
15 know, will you let me know that?
16 A. Yes.
17 Q. Okay. And if that happens, we'll -- we'll
18 establish whether there is someone who is
19 designated to -- to speak on that question or
20 whether we can find somebody who -- who is.
21 Now, when we served the Notice of
22 Deposition on Local 556's attorney, there was a
23 list of potential areas that we might be asking
24 questions about; were you shown that list?
25 A. Which list?

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1 Q. A list of topics that we would potentially
2 be examining Local 556 about.
3 A. Yes.
4 Q. Okay. And you have reviewed that list to
5 try to get up to speed the best you could?
6 A. Yes, I have.
7 Q. Okay. Now, did you have any
8 communications with anyone from Local 556 in
9 preparation for this deposition?
10 A. Does -- besides legal counsel?
11 Q. Besides legal counsel, correct.
12 A. No.
13 Q. Okay. And did you review any documents in
14 preparation for this deposition?
15 A. Yes.
16 Q. Okay. And what did you review?
17 A. I reviewed some executive board meeting
18 minutes.
19 Q. Okay. And what else did you review?
20 A. I reviewed the -- some board of election
21 reports.
22 Q. Okay. What else did you review?
23 A. That's -- that's all.
24 Q. Okay. And which executive board meeting
25 minutes did you review?

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1 A. I reviewed -- I skimmed executive board
2 meeting minutes from 2017.
3 Q. Okay. Do you know which month in -- in
4 2017?
5 A. I skimmed, I believe it was August through
6 December.
7 Q. Okay. Did you review any other executive
8 board meeting minutes?
9 A. No.
10 Q. Okay. And which board of election reports
11 did you review?
12 A. I reviewed the reports that were posted
13 regarding our officer election in 2015, as well as
14 both of the tentative agreement contract votes.
15 Q. Okay. And did you review any -- any other
16 board of election reports?
17 A. No, I did not.
18 Q. Okay. All right. Now, you mentioned the
19 reports posted regarding officer elections from
20 2015; whose reports would those have been?
21 A. The board of election.
22 Q. Okay. And that's Local 556's board of
23 election?
24 A. Yes.
25 Q. Okay. And do they typically publish

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1 reports on -- on the officer elections?

2 **A. Yes.**

3 Q. Okay. And what do their reports say?

4 **A. Their reports contain the voting**
5 **statistics; typically, broken down both by**
6 **domicile, as well as overall participation, total**
7 **membership numbers and the final vote in terms of**
8 **the outcome of the vote.**

9 Q. Okay. And are those board of election
10 reports disseminated to the executive board?

11 **A. Yes, they are presented to the executive**
12 **board.**

13 Q. Okay. And do the -- are the reports, I
14 guess, presented to the membership -- the rest of
15 the membership?

16 **A. Yes, they are.**

17 Q. Okay. All right. And you said you also
18 reviewed both of the tentative agreement contract
19 votes. Are those -- or, I guess, is that voting
20 information contained in a specific type of report?

21 **A. It's documents that the board of election**
22 **prepares.**

23 Q. Okay. All right. And for the first
24 tentative agreement, do you recall how many --
25 well, let me ask it this way: For the first

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1 tentative agreement, do you know what percentage of
2 the union membership voted to ratify the first TA?

3 **A. It was approximate -- I am sorry. That**
4 **voted to ratify the TA?**

5 Q. Yes.

6 **A. In the first tentative agreement?**

7 Q. Yes, ma'am.

8 **A. That was approximately 13 percent.**

9 Q. Okay. And what percentage voted to ratify
10 the second tentative agreement?

11 **A. That was approximately 54 percent of the**
12 **eligible members that voted.**

13 Q. Okay. All right. Last time, I guess,
14 during -- during your last deposition, we talked a
15 little bit about collective bargaining agreement
16 negotiations. When you became president, were
17 contract negotiations already underway?

18 **A. No, they were not.**

19 Q. And was the contract -- do you recall when
20 that first contract became amendable?

21 **A. June 1st, 2013.**

22 Q. Okay. Now, in June 1st, 2013, were you,
23 as president, the lead negotiator for TWU Local
24 556?

25 **A. I don't believe I was as of June 1st,**

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1 **2013. I became lead negotiator as president right**
2 **around that time, shortly after.**

3 Q. Okay. And who was lead negotiator for
4 Local 556 prior to you?

5 **A. Prior to me, that would have been the**
6 **president -- prior president Stacy K. Martin.**

7 Q. Now, when Stacy Martin was removed as
8 president, was he not automatically removed as lead
9 negotiator for the negotiating team?

10 **A. Yes, he was.**

11 Q. Okay. He was. All right. All right.
12 Now, at any point during -- during your presidency,
13 was there a changeover in who the lead negotiator
14 was?

15 **A. No, there was not.**

16 Q. Okay. So the only changeover in who the
17 lead nego- -- negotiator was in 2013 was when you
18 became the lead negotiator?

19 **A. That's correct.**

20 Q. Okay. All right. And do -- so the
21 contract negotiations began how soon after June
22 1st, 2013?

23 **A. I believe they opened around June 10th.**

24 Q. Okay. Now, were you the only person who
25 changed on the negotiating team at that time?

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1 **A. In June, 2013?**

2 Q. Yes.

3 **A. Yes.**

4 Q. Okay. And do you recall who else was on
5 the negotiating team at -- around June 2013?

6 **A. Paul Sweetin, Bill Holcomb, Brett Nevarez**
7 **and Val Lorien.**

8 Q. Okay. And those were the only members on
9 the negotiating team for Local 556?

10 **A. Yes.**

11 Q. Okay. Do you remember who was on the
12 negotiating team for Southwest at that time?

13 **A. Naomi Hudson, Brandon Conlon, Claire**
14 **Taitte, Kevin Allen, Juan Suarez, Joe Harris.**

15 Q. Was there anyone else on the negotiating
16 team for Southwest that you recall?

17 **A. Not that I recall at that time.**

18 Q. Okay. And did anyone from Southwest
19 communicate any concerns about the changeover in
20 lead negotiator when you became lead negotiator?

21 **A. No.**

22 Q. Okay. And -- and do you know if the
23 company had any concerns about the changeover in
24 lead negotiator when you became lead negotiator?

25 **A. Not that I am aware of.**

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1 Q. Okay. And prior to the vote on the first
2 TA, was there any changeover at all in Local 556's
3 negotiating team?

4 **A. There was.**

5 Q. Okay. And what -- what were those
6 changes?

7 **A. Brandon Hillhouse replaced Val Lorian on**
8 **the negotiating team.**

9 Q. Okay. And I guess I should ask: Is -- is
10 Paul Sweetin a member of Local 556?

11 **A. Yes, he is.**

12 Q. Okay. And at that time, in 2013, was Paul
13 Sweetin a -- an officer?

14 **A. No, he was not.**

15 Q. Okay. Did Paul Sweetin have any elected
16 positions with the union? Well, let me -- let me
17 ask the question a little bit better.

18 At -- at the time of 2013, when the
19 contract negotiations were taking place, did Paul
20 hold an elected office with the union?

21 **A. I -- he may have been a shop steward; I**
22 **don't recall.**

23 Q. Okay. And at the time of negotiations in,
24 I guess, June of -- well, after June of 2013, did
25 Val Lorian hold elected office with the union?

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1 **A. I believe he was a shop steward as well.**

2 Q. Okay. And as -- as president, you are
3 automatically -- are you automatically part of the
4 negotiating team?

5 **A. Yes.**

6 Q. Okay. And was that also true -- well, let
7 me ask it this way: As an elected office holder,
8 was Brett Nevarez automatically part of the
9 negotiating team?

10 **A. No.**

11 Q. Okay. And maybe I'm assuming too much
12 there. Was -- was Brett Nevarez an elected officer
13 at the time of negotiations in 2013?

14 **A. Yes, he was.**

15 Q. Okay. And how did Brett Nevarez come to
16 be part of the negotiating team?

17 **A. He was elected as a member of the**
18 **negotiating team.**

19 Q. Okay. And are all members of Local 556's
20 negotiating team elected?

21 **A. No.**

22 Q. Okay. How many -- well, so of the members
23 of the negotiating team who aren't elected, how do
24 they come to be members of Local 556's negotiating
25 team?

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1 **A. They are appointed by the executive board.**

2 Q. Okay. And was Paul Sweetin appointed by
3 the executive board?

4 **A. Yes, he was.**

5 Q. Okay. And was Val Lorian appointed by the
6 executive board?

7 **A. Yes, he was.**

8 Q. And was Brett Nevarez also appointed by
9 the executive board?

10 **A. No, he was not.**

11 Q. Okay. How did Brett Nevarez come to be on
12 the executive board?

13 **A. He was elected by the membership --**

14 Q. Oh, I am sorry.

15 **A. -- for the negotiating team.**

16 Q. Okay. And that's a general election of
17 all union members?

18 **A. Yes, it is.**

19 Q. Okay. All right. Do you recall when Paul
20 Sweetin was appointed to the negotiating team?

21 **A. He was appointed by the previous executive**
22 **board. I was not a part of that executive board.**
23 **I believe it was sometime in 2012.**

24 Q. Okay. And was Val Lorian also appointed
25 by the previous executive board?

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1 **A. Yes, he was.**

2 Q. Okay. And prior to the vote on the first
3 tentative agreement, were any other members of the
4 negotiating team replaced besides Val Lorian?

5 **A. No.**

6 Q. Okay. All right. And did the new
7 executive board appoint Brandon Hillhouse to
8 replace Val Lorian?

9 **A. Yes, they did.**

10 Q. Okay. And did the -- the same executive
11 board vote to remove Val Lorian from the
12 negotiating team?

13 **A. No, they did not.**

14 Q. Okay. Why did Val Lorian leave the
15 negotiating team?

16 **A. Val Lorian left because of some things**
17 **that he had said and done that were not considered**
18 **professional or appropriate for a leader of our**
19 **union.**

20 Q. Okay. And was -- was Val Lorian
21 disciplined by the company for the things he said?

22 **A. No, I don't believe so.**

23 Q. Okay. And did Val Lorian remain a union
24 member?

25 **A. During --**

1 Q. I am sorry. I'll ask the question a
2 different way. So after Val Lorient, I guess, left
3 the negotiating team, did he remain a union member?

4 **A. At that time, yes.**

5 Q. Okay. And does Val Lorient no longer work
6 for the company?

7 **A. That's correct.**

8 Q. Okay. Do you know why Val Lorient left the
9 company?

10 **A. Yes.**

11 Q. Okay. And why did Val Lorient leave the
12 company?

13 **A. He took a position at another air carrier.**

14 Q. Okay. But Val Lorient wasn't terminated by
15 the company?

16 **A. Yes, he was.**

17 Q. Okay. When was Val Lorient terminated by
18 the company?

19 **A. I don't remember.**

20 Q. Okay. Do you remember if -- if Val Lorient
21 was terminated before the vote on the first TA?

22 **A. I don't remember.**

23 Q. Okay. Do you know why Val Lorient was
24 terminated by the company?

25 **A. Yes.**

1 Q. Okay. And why was Val Lorient terminated
2 by the company?

3 **A. Because he took a job with another**
4 **carrier, which we're not allowed to do under our**
5 **work rules. And I believe he had also called out**
6 **sick for Southwest Airlines while he was working**
7 **for the other carrier.**

8 Q. Okay. All right. Now, when the executive
9 board voted to send the first TA to the membership
10 for a vote, did the negotiating team give any
11 recommendations to the executive board as to
12 whether to send it to the -- the membership to vote
13 on?

14 **A. No. The negotiating team just presented**
15 **to the executive board.**

16 Q. Okay. And were there members of the
17 executive board who did not want to present to --
18 the tentative agreement to the membership vote?

19 **A. Yes.**

20 Q. Okay. And did they -- did those executive
21 board members explain why they didn't want to send
22 it to the membership to vote on?

23 **A. Yes.**

24 Q. Okay. And why did those executive board
25 members not want to present it to the membership to

1 vote on?

2 **A. Some of the board members felt like --**

3 MR. GREENFIELD: Ms. -- Ms. Stone --
4 Ms. Stone, if you can -- if you may for a moment, I
5 don't know exactly where your testimony is going to
6 come from, but if it came during any sort of
7 executive session while legal counsel was present
8 in providing advice, I would advise you not to
9 testify that -- to that as attorney/client
10 privilege. But to the extent it was -- it was not,
11 please answer the question to the best of your
12 ability.

13 Q. (By Mr. Gilliam) And are -- are you able
14 to answer the question, Ms. Stone?

15 **A. Yes.**

16 Q. Okay.

17 **A. There were some members of the executive**
18 **board that felt like there were too many changes.**

19 Q. Okay. That there were too many changes
20 from the prior collective bargaining agreement?

21 **A. Yes.**

22 Q. Okay. And did those -- well, did any
23 executive board members express any other concerns
24 apart from there being too many changes?

25 **A. Different board members had different --**

1 **different thoughts on it and different concerns.**

2 Q. Okay. What were some of the other
3 objections to presenting the -- the tentative
4 agreement to membership?

5 **A. An extended duty day was one of them. And**
6 **the change to the vacation was another.**

7 Q. Okay. Do you recall any other concerns
8 voiced by the executive board members to presenting
9 the -- the tentative agreement to membership?

10 **A. No.**

11 Q. Okay. And were there specific changes to
12 the CBA that the executive board members objected
13 to?

14 **A. What do you mean?**

15 Q. Well, did any of the executive board
16 members identify specific changes from the prior
17 CBA that they think -- they thought should not be
18 presented to the membership to vote on?

19 **A. Besides what I just spoke to?**

20 Q. Well, you mentioned that there were --
21 that one of the concerns was too many changes, but
22 were there specific changes that the executive
23 board members identified?

24 **A. The change in the vacation pay and the**
25 **change in the duty day.**

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1 Q. Okay. And there weren't any other changes
2 that executive board members found objectionable?

3 **A. Not that I recall.**

4 Q. Okay. And what -- what was the change
5 involving the extended duty day? Or let me ask it
6 this way: In -- how did the tentative agreement
7 change the extended duty day from the prior CBA?

8 **A. The prior CBA had a 10-and-a-half-hour**
9 **limit on what we could be scheduled at. And the**
10 **proposed agreement extended that to 12 hours with a**
11 **change in how the release and report was calculated**
12 **as well.**

13 Q. Okay. And what was the change to vacation
14 pay?

15 **A. Instead of it being a set minimum per day,**
16 **it was going to change and be a pay model that was**
17 **variable similar to our sick -- sick bank in the**
18 **way you earned it. The more you flew, the higher**
19 **your productivity, the more your vacation would**
20 **pay. Conversely, if you were not -- were somebody**
21 **that flew less, your vacation could pay less.**

22 Q. And with the second tentative agreement,
23 did it include the change to vacation pay?

24 **A. It did not.**

25 Q. Okay. And did the second tentative

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1 **changes throughout; and with less changes, I**
2 **believe, was more easily understood.**

3 Q. Okay. And were there differences between
4 the second TA and the prior collective bargaining
5 agreement that was in effect?

6 **A. Yes, there were.**

7 Q. Okay. And after the first TA was
8 rejected, were there any further changes in the
9 negotiating team?

10 **A. Yes, there were.**

11 Q. Okay. What were the other changes in the
12 negotiating team after the first TA was rejected?

13 **A. Both of the appointed negotiating team**
14 **members were replaced after they resigned.**

15 Q. Okay. I am sorry. Was Bill Holcomb also
16 an elected member of the negotiating team?

17 **A. Yes, he was.**

18 Q. Okay. Okay. And so Paul Sweetin was one
19 of the appointed members who resigned?

20 **A. Yes, he was.**

21 Q. And why did he resign?

22 **A. He felt like he was going to be removed by**
23 **the executive board anyway. And he chose to go**
24 **ahead and resign on his own.**

25 Q. Okay. And did the executive board want to

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1 agreement include the extended duty day change?

2 **A. It -- no, it did not.**

3 Q. And we may have talked about it before,
4 but did the executive board vote to present the
5 second TA to the membership prior to their vote?

6 **A. Yes, they did.**

7 Q. Okay. And, again, to the extent that the
8 communications didn't involve the -- the presence
9 of counsel, did the executive board members -- or
10 did any executive board members raise any
11 objections to presenting the second TA to the
12 membership?

13 **A. No, not that I recall.**

14 Q. Okay. And, I mean, do you -- do you
15 believe that those changes to the TA were what made
16 the difference in getting it ratified?

17 **A. I believe they were part of the reason**
18 **that made the difference.**

19 Q. Okay. What were the other reasons you
20 think made the difference?

21 **A. The feedback we heard regarding the first**
22 **TA was that, overall, it had too many changes.**
23 **There were pieces of it that were not well**
24 **understood that people believed were too**
25 **complicated. And the second TA overall had less**

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1 remove Paul Sweetin?

2 **A. Yes, they did.**

3 Q. Okay. And what --

4 **A. Some members.**

5 Q. Okay. And did -- did those members, I
6 guess, voice their reasons why they wanted to
7 remove Paul Sweetin?

8 **A. They believed that pressure from the**
9 **membership wanted -- that be -- that because the**
10 **membership wanted to see some changes on the**
11 **negotiating team and they were -- felt pressure**
12 **from the membership to make some changes.**

13 Q. Okay. Do you know if any other reasons
14 were expressed by executive board members about why
15 Paul Sweetin should resign?

16 **A. No, not to my knowledge.**

17 Q. Okay. And do you know why Brandon
18 Hillhouse resigned?

19 **A. Yes.**

20 Q. Okay. Why did Brandon Hillhouse resign?

21 **A. He did not want to continue on the**
22 **negotiating team. He did not like how -- he -- how**
23 **some of the things -- just the stress of the job.**
24 **He was having a difficult time dealing with that**
25 **following the -- the failure of the TA and had been**

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1 **disappointed. And he chose to resign.**

2 Q. And did the -- did any of the executive
3 board members discuss removing Brandon Hillhouse,
4 as well, prior to Brandon's resignation?

5 **A. Yes, they did.**

6 Q. Okay. And what were some of the reasons
7 discussed as to why they wanted to remove Brandon
8 Hillhouse?

9 **A. For the same reasons as Paul Sweetin; that**
10 **they felt like the membership wanted to see some**
11 **change on the negotiating team.**

12 Q. Okay. And did those executive board
13 members present any other reasons as to why Brandon
14 should be removed?

15 **A. No, not to my knowledge.**

16 Q. Okay. And who replaced Paul Sweetin and
17 Brandon Hillhouse on the negotiating team?

18 **A. Trish Krider and Don Shipman.**

19 Q. Okay. And did Trish Krider and Don
20 Shipman remain on the negotiating team through the
21 ratification of the second TA?

22 **A. Yes, they did.**

23 Q. Okay. And were there any other changes on
24 the negotiating team through the ratification of
25 the second tentative agreement?

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1 board also get feedback from membership meetings
2 after the -- the first TA was rejected?

3 **A. Yes.**

4 Q. Okay. All right. So it was through those
5 two sources that the executive board heard why
6 members -- many members were -- were rejecting the
7 tentative agreement?

8 **A. Those were two of the sources.**

9 Q. Okay. Were there some other sources where
10 the executive board members learned why members may
11 have voted the way they did?

12 **A. Yes.**

13 Q. Okay. What were some of those other
14 sources?

15 **A. The executive board heard via email. The**
16 **executive board heard from members directly in**
17 **their domicile face-to-face. The executive board**
18 **heard through phone calls from members.**

19 Q. Okay. And, now, between the time that the
20 first tentative agreement was rejected and the
21 second tentative agreement was ratified, did
22 Southwest's negotiating team change at all?

23 **A. No, they did not.**

24 Q. Okay. Okay. Now, I think, in your --
25 your other deposition, you may have said that after

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1 **A. No, there were not.**

2 Q. Okay. All right. Now, after the first
3 tentative agreement was rejected, did the executive
4 board receive feedback about the vote through the
5 contract action network?

6 **A. Can you repeat the question, please?**

7 Q. Yeah. And -- and just to refresh my
8 memory a little bit, what is it that the contract
9 action network does?

10 **A. The contract action network was a group of**
11 **flight attendants from all domiciles who assisted**
12 **the negotiating team in directing members to**
13 **negotiating team updates; where to find information**
14 **about negotiations; how to contact the negotiating**
15 **team. They were, you know, the kind of**
16 **face-to-face out in the domiciles when we were at**
17 **the bargaining table to just help communicate**
18 **additional information about the status of**
19 **negotiations.**

20 Q. Okay. And was the contract action network
21 giving the executive board members feedback of what
22 they have heard from membership after the first TA
23 was rejected?

24 **A. Yes.**

25 Q. Okay. And, I guess, did the executive

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1 the collective bargaining agreement was signed in
2 January of 2017, the -- the negotiating teams for
3 Southwest and the union continued to -- to meet on
4 some issues; is that correct?

5 **A. Yes.**

6 Q. Okay. And what were some of the issues
7 they continued to meet about?

8 **A. Working through the implementation**
9 **schedule of when the changes in the new collective**
10 **bargaining agreement, when they would be**
11 **implemented; time frames for that. As well as**
12 **working on a comprehensive question and answer --**
13 **Q&A document on both the new changes in the**
14 **contract, as well as combining it with previous**
15 **Q&As that it had done on previous contracts, the**
16 **pieces that were still relevant to create a**
17 **comprehensive document.**

18 **And then members of the negotiating**
19 **team, along with members of the scheduling**
20 **committee, also began meeting to discuss**
21 **satellite-based test agreement per the language in**
22 **the CBA that was ratified.**

23 Q. All right. And of -- of the new changes
24 with the new CBA, what -- what -- what changes were
25 being implemented in 2017?

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1 **A. The -- there were changes in Article 32**
2 **that were being implemented in 2017.**

3 Q. And what is Article 32 about?

4 **A. Attendance policy.**

5 Q. Okay. All right. Were there other
6 changes that were being implemented in 2017 that
7 you recall?

8 **A. That's what I can recall off the top of my**
9 **head for 2017.**

10 Q. Okay.

11 **A. I -- I did think of something else. One**
12 **of the additional pay rates was implemented in 2017**
13 **too.**

14 Q. Okay. And when did the new pay rates go
15 into effect?

16 **A. The first one went into effect November**
17 **1st, 2016. And the second one went into effect**
18 **November 1st, 2017. And the final one went into**
19 **effect November 1st, 2018.**

20 Q. Okay. All right. And when did that 2000
21 -- well -- yeah, when did that, I guess, 2017
22 contract become amendable?

23 **A. There wasn't a 2017 contract.**

24 Q. Yeah. I am sorry. The -- the CBA -- I am
25 not sure what -- the date range on it, but the --

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1 the CBA that, I guess, was signed in January of
2 2017, when did that become amendable?

3 **A. November 1st, 2018.**

4 Q. Okay. And apart from what you described
5 with the implementation schedule, the Q&A document
6 and meeting, I guess, about the satellite base test
7 agreement, did the negotiating team -- teams meet
8 to discuss any other issues after January 2017?

9 **A. No, they didn't.**

10 Q. Okay. All right. Now, when did you first
11 hear about the idea of a petition to recall
12 executive board members?

13 **A. I believe it was the latter part of 2016.**

14 Q. Okay. And do you know if the executive
15 board discussed the -- the recall petition prior to
16 the latter part of 2016?

17 **A. I don't recall.**

18 Q. Okay. And did -- was the executive board
19 aware that a recall petition was being circulated
20 prior to latter part of 2016?

21 **A. I -- the executive board became aware of**
22 **it once it was circulating. I just don't recall**
23 **exactly when that was.**

24 Q. Okay. And how did the executive board
25 become aware of the recall petition being

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1 circulated?

2 **A. I believe there were board members that**
3 **had been in the lounge and had heard flight**
4 **attendants talking about it.**

5 Q. Which executive board members had, I
6 guess, become aware of the recall petition being
7 circulated?

8 **A. There were some domicile executive board**
9 **members. I don't recall which ones.**

10 Q. Okay. And what were the domicile
11 executive board members saying about the recall
12 petition?

13 **A. That there was a recall petition to --**
14 **going around to recall most of the executive board;**
15 **specifically, the executive board members that had**
16 **voted to put the tentative agreement out to the**
17 **membership for a vote. I believe we also received**
18 **communication from -- from members as well about**
19 **the recall petition.**

20 Q. Okay. And the -- do you recall when the
21 recall petition was actually turned in to Local
22 556?

23 **A. I believe sometime in early 2017.**

24 Q. Okay.

25 MR. GREENFIELD: And, Matthew, for the

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1 record, we will be providing another witness to go
2 more in depth on several issues regarding the
3 recall effort and processes and procedures,
4 et cetera.

5 MR. GILLIAM: Okay.

6 Q. (By Mr. Gilliam) In -- why -- I guess --
7 did the executive board members you mentioned that
8 were talking about hearing about the -- the recall
9 petition, did -- did they say why the recall
10 petition was targeting executive board members who
11 voted to put the TA out?

12 **A. No, I don't recall specifics other than it**
13 **was just naming the board members who did vote to**
14 **put it out.**

15 Q. Okay. And, I guess, which -- which
16 executive board members voted against putting the
17 TA out?

18 **A. Donna Keith, Jessica -- Jessica Parker,**
19 **John DiPippa; and I believe B.R. Ricks, but I am**
20 **not positive.**

21 Q. Okay. All right.

22 MR. GILLIAM: And can we go off the
23 record for just a moment?

24 MR. CLOUTMAN: Sure.

25 (Off-the-record discussion.)

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1 (Recess taken.)
2 (Testimony of Lyn Montgomery was taken
3 during this time and now resuming with
4 Audrey Stone.)
5 Q. (By Mr. Gilliam) All right. I guess we
6 are back on the record. Ms. Stone, we were talking
7 a little bit about the recall petition. What did
8 Local 556 do with the recall petition when it was
9 delivered?
10 **A. The executive board made a motion that it**
11 **was not proper and legally inoperative and that the**
12 **signatures would not be considered.**
13 Q. Okay. When did the executive board make
14 that determination?
15 **A. I believe that was early, mid-2017.**
16 Q. Okay. And was the International involved
17 in that decision-making process at all?
18 THE REPORTER: She's frozen.
19 MR. GILLIAM: Yeah.
20 MR. GREENFIELD: I assume she will be
21 back shortly. But on this, Matthew -- and I -- and
22 I can't remember if I have shared it with you -- we
23 will also be putting forth Donna Keith today on
24 several issues regarding the recall petition.
25 MR. GILLIAM: Okay.

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1 MR. CLOUTMAN: And Jessica Parker.
2 MR. GREENFIELD: And Jessica Parker.
3 Thank you.
4 MR. GILLESPIE: She's trying to --
5 she's trying to sign back in. I am going to try to
6 call her and see what is going on. I will just
7 mute my mic and watch this if she pops back up.
8 MR. GILLIAM: I'll -- I'll be close by
9 here. I will do the same.
10 MR. GILLESPIE: Okay.
11 (Recess taken.)
12 Q. (By Mr. Gilliam) Okay. We will just hop
13 back on the record. All right, Ms. Stone, you were
14 reelected to president in March 2015, correct?
15 **A. Yes, that's correct.**
16 Q. Okay. And was there a complaint filed
17 with the Department of Labor about those elections?
18 **A. Yes, there was.**
19 Q. Okay. And what was the complaint about?
20 **A. I don't remember the specifics of -- of**
21 **the DOL complaints. I believe there was more than**
22 **one.**
23 Q. Okay. What -- what do you remember about
24 either complaint?
25 **A. I believe it was filed by Chris Click.**

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1 Q. And do you know if two separate -- well,
2 do you know if both were filed or do you believe
3 both --
4 **A. I don't know.**
5 Q. Okay. Do you --
6 **A. And I --**
7 Q. -- do you remember any of the general
8 allegations of the complaint?
9 **A. I think there was a question regarding if**
10 **any union resources had been utilized during the**
11 **election.**
12 Q. Okay. And let's see. If I could mark
13 Document 12, if you still have your documents
14 handy. I am not sure what exhibit number we're on.
15 I guess this is exhibit -- I don't know if we were
16 -- I think we were doing the continuing --
17 THE REPORTER: It will be Number 20.
18 MR. GILLIAM: Okay. Yeah, let's --
19 MR. GILLESPIE: We weren't really
20 ready for documents. I am sorry. So are these the
21 same ones that were used during her deposition?
22 MR. GILLIAM: Yes. Yeah.
23 MR. GILLESPIE: Okay. So, Audrey, do
24 you have a copy of the PDFs from your deposition?
25 THE WITNESS: I'll have to pull them

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1 up. It will take me a moment. I didn't have those
2 ready. I think I can still access them.
3 MR. GILLIAM: And did they -- they
4 send you the new batch of documents for Local 556?
5 MR. GILLESPIE: Not that I am aware
6 of.
7 MR. GREENFIELD: I can send those over
8 right now --
9 MR. GILLIAM: Okay.
10 MR. GREENFIELD: -- just so she has
11 them -- she has them in case there are any
12 additional questions on those.
13 MR. GILLIAM: Whenever you are
14 ready --
15 MR. GREENFIELD: Audrey, I am going to
16 send I-12 as well. And, Joe, you too, I will CC
17 you on this. It is sent. So let me know or let
18 Matthew know when -- when you have what you need.
19 MR. GILLESPIE: Audrey, let us know
20 when you have had a chance to get those documents.
21 THE WITNESS: I have them and am just
22 reviewing.
23 MR. GILLESPIE: Okay.
24 MR. GILLIAM: Yeah. If you want to
25 take a look at Document 12 once you have had the

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1 chance to review it, let me know and I will
2 continue.
3 (Exhibit 20 marked.)
4 THE WITNESS: Okay.
5 Q. (By Mr. Gilliam) Now, do you recognize
6 this?
7 **A. Just from -- just from looking at it right**
8 **now.**
9 Q. Okay. And -- and what is it?
10 **A. It is a letter from the Department of**
11 **Labor addressed to me extending -- I believe it's**
12 **extending the time in which a complaint could be**
13 **filed.**
14 Q. And --
15 **A. And it was --**
16 Q. Oh, I am sorry to interrupt. Were you
17 finished?
18 **A. I just -- I -- I was -- no. I was just**
19 **continuing down. It was signed by one of our legal**
20 **counsels.**
21 Q. Okay. And do you know if a suit was ever
22 filed as a result of this complaint?
23 **A. A legal suit?**
24 Q. Yes.
25 **A. No, not to my knowledge.**

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1 Q. Okay. Do you know what the outcome of the
2 investigation was?
3 **A. The outcome was that the Department of**
4 **Labor did not find any violations in how TWU Local**
5 **556 conducted the officer elect -- officer and**
6 **board elections.**
7 Q. Okay. Do you know if that decision was
8 appealed in any way?
9 **A. I don't know if it was appealed.**
10 Q. Okay. Now, I think, earlier, we were
11 talking a little bit about the -- the recall. And
12 do -- do you know if the recall group took any
13 particular position on the first tentative
14 agreement?
15 **A. What do you mean the recall group?**
16 Q. Well, there was a group of flight
17 attendants who supported the recall of certain
18 executive board officers, correct?
19 **A. Yes.**
20 Q. And, I guess, within that group, there
21 were -- I guess, there were a group of flight
22 attendants who -- who supported that effort,
23 correct?
24 **A. Yes.**
25 Q. Okay. Now, do you know if that group of

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1 flight attendants opposed the ratification of the
2 first tentative agreement?
3 MR. GREENFIELD: I am going to object
4 to the question being vague. I am -- I am just not
5 clear as to what group you are talking about,
6 Matthew.
7 Q. (By Mr. Gilliam) You can answer if you --
8 you understood, Ms. Stone.
9 **A. I -- I don't understand what you are**
10 **asking.**
11 Q. So there were a particular group of flight
12 attendants that supported the -- the recall of the
13 556 executive board officers, correct?
14 **A. Yes.**
15 Q. Okay. Do you know if that same group of
16 flight attendants opposed the ratification of the
17 first tentative agreement?
18 MR. GREENFIELD: Objection to calling
19 for speculation, you know, the recall petition.
20 Again, the vagueness of what group you are talking
21 about. There was, you know, a large petition put
22 together. So I -- I am not sure exactly who you
23 are referring to.
24 MR. GILLIAM: Well, and I asked her
25 too if she -- she knew if the recall group opposed.

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1 MR. GREENFIELD: There was -- there
2 was a recall petition filed, so there is -- there
3 is certainly a group of individuals who -- who
4 filed that. But, I guess, if you are asking for,
5 you know, what specific individuals thought within
6 that, I think that's, again, asking for speculative
7 testimony. And -- and, again, vague on -- to who
8 you are specifically talking about. Unless you are
9 talking about the entire group, which I don't know
10 that she can -- she can properly testify to an
11 entire group.
12 Q. (By Mr. Gilliam) Well, do you -- do you
13 remember some of the recall supporters?
14 **A. Yes.**
15 Q. Okay. And who were some of those recall
16 supporters?
17 **A. Jeanna Jackson.**
18 Q. Okay. Who else?
19 **A. Chris Click.**
20 Q. Okay. Who else?
21 **A. Greg Hofer.**
22 Q. All right. Who else?
23 **A. Those are the names that come to mind off**
24 **the top of my head.**
25 Q. Okay. You don't recall any other recall

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1 supporters?
2 **A. Specifically, no.**
3 Q. Okay. Do you know if Jeanna Jackson
4 opposed ratification of the first tentative
5 agreement?
6 **A. I don't know how she voted on the**
7 **tentative agreement.**
8 Q. Do you know if she ever made any
9 statements opposing the ratification of the first
10 tentative agreement?
11 **A. Yes.**
12 Q. Okay. And did she?
13 **A. Yes.**
14 Q. Okay. What do you recall about the
15 statement she made in opposition to the first
16 tentative agreement?
17 **A. That she -- she didn't like it; that she**
18 **didn't think it was a good agreement.**
19 Q. Do you recall what exactly she opposed in
20 the first tentative agreement?
21 **A. No, I don't.**
22 Q. Okay. Do you remember Chris Click making
23 any statements in opposition to the first tentative
24 agreement?
25 **A. Yes.**

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1 Q. Okay. And what -- what do you recall
2 about the statements he made in opposition to the
3 first tentative agreement?
4 **A. I believe he posted a long list of various**
5 **items that he -- his interpretation of them -- his**
6 **interpretation of the changes, as well as his**
7 **opinion about the changes. I don't recall**
8 **specifics. It was -- my recollection, it was a**
9 **lengthy -- a lengthy list.**
10 Q. Okay. Where did he post that list?
11 **A. I believe it was on Facebook.**
12 Q. Do you recall if it was in any particular
13 Facebook group?
14 **A. No.**
15 Q. Okay. And how did you become aware of
16 that post?
17 **A. I think he may have emailed -- may have**
18 **emailed the executive board with the same list.**
19 Q. Do you recall when he sent that email?
20 **A. No. And I am not positive.**
21 Q. Do you recall any other statements Chris
22 Click made in opposition to ratification of the
23 first tentative agreement?
24 **A. No.**
25 Q. Okay. Do you recall any statements that

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1 Greg Hofer made in opposition to the first
2 tentative agreement?
3 **A. Not specifically. Just that he -- he**
4 **didn't support it.**
5 Q. And how did you become aware that he
6 didn't support it?
7 **A. Flight attendant feedback. There was just**
8 **chatter that people are talking about it on social**
9 **media.**
10 Q. Do you remember where on social media you
11 saw it?
12 **A. I don't know that I saw it myself. Other**
13 **-- other flight attendants were talking about**
14 **seeing it and that there was discussion in various**
15 **Facebook groups once the TA was released.**
16 Q. Okay. And who relayed those discussions
17 to you?
18 **A. I don't recall specifically.**
19 Q. Do you recall whether they were executive
20 board members?
21 **A. They could have been.**
22 Q. Okay. All right. One minute. Wanted to
23 shift back to the -- the social media policies; we
24 discussed those a little bit in -- in your
25 deposition. If I could have you review -- let me

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1 see which document it is in. 13. I guess we mark
2 that as Exhibit 21.
3 (Exhibit 21 marked.)
4 MR. GREENFIELD: And is this Document
5 13 from the first batch when you deposed her in her
6 individual capacity?
7 MR. GILLIAM: Yes. Yeah.
8 MR. GREENFIELD: Okay. Ms. Stone, do
9 you have that document? I can email it to you
10 pretty quickly if you do not.
11 THE WITNESS: I do have it. I want to
12 make sure I am reviewing the correct one. It's --
13 if it's the part of a Unity update that included a
14 president's message from April 2015?
15 Q. (By Mr. Gilliam) Yes. That's it.
16 **A. Okay.**
17 Q. All right. So you recognize this
18 document?
19 **A. Yes, I do.**
20 Q. And what is it?
21 **A. It is part of a Unity update that was**
22 **published on April 20th, 2015 and it contains a**
23 **president's message from me.**
24 Q. Okay. Now, it starts off and says, in my
25 last's president message, I address social media.

1 Did -- when did Local 556 issue the
2 prior president's message?

3 **A. I am not certain, looking at this, which**
4 **-- if it had been the very last one, we usually**
5 **issued Unity updates on the 5th and 20th of the**
6 **month. So based off of that, I am assuming it**
7 **would have been referring to April 5th.**

8 Q. Okay. Do you recall whether you made a
9 statement in the president's message on social
10 media on April 5th?

11 **A. I don't.**

12 Q. Okay. Do you recall whether you made any
13 statements in, I guess, the Unity update at any
14 time prior to April 5th?

15 **A. I don't recall specifics.**

16 Q. Okay. And do you recall also issuing an
17 apology on social media about some of the posts
18 that were made in connection with the Core group?

19 **A. In what capacity?**

20 Q. Well, I guess, let's maybe make this
21 easier. If I could refer you to -- forget which
22 document it is here -- Document 17.

23 **A. Okay.**

24 Q. And have you had a chance to look at this?

25 **A. Yes.**

1 Q. Okay. Do you know who might recall what
2 was stated in the president's message in the last
3 Unity update?

4 **A. Do I know who would recall?**

5 Q. Yes, yeah, if you know if there's somebody
6 from the union who would be able to address what
7 was stated in the --

8 **A. If there's somebody who has reviewed that**
9 **document recently.**

10 Q. Okay. And these -- are these Unity
11 updates, I guess, they are published by Local 556?

12 **A. Yes.**

13 Q. Okay. Is there someone in charge of, I
14 guess, assembling the -- the update and -- and
15 disseminating it?

16 **A. Yes.**

17 Q. Okay. Who is that person?

18 **A. Our communications chairperson is who was**
19 **responsible for organizing the content, formatting**
20 **it and emailing it out to the membership.**

21 Q. Okay. What is that person's name?

22 **A. At that time?**

23 Q. Yes.

24 **A. Cuyler Thompson.**

25 Q. Okay. Do you know who that person is now?

1 Q. Okay. And this is an apology you made in
2 connection with the -- some, I guess, social media
3 activity on the Core Team website, correct?

4 **A. Yes.**

5 Q. Okay. And do you know, when you, I guess,
6 issued this statement, was it part of a Unity
7 update?

8 **A. No, it was not. It was done by me**
9 **personally, not via a union communication.**

10 Q. Okay. And when you posted it, where did
11 you post it?

12 **A. Fusion.**

13 Q. Okay. All right. But you do not recall
14 addressing any social media issues in Unity prior
15 to April of 2015?

16 **A. I don't recall the specifics. I**
17 **frequently wrote about topics going on within the**
18 **union.**

19 Q. Okay. Do you recall, I guess, discussing
20 social media generally as a topic in the Unity
21 update prior to April of 2015?

22 **A. I -- I wrote that I had addressed it in a**
23 **previous message, so that means that I -- I think I**
24 **would have. I just don't know specifically what --**
25 **without reviewing that document, what I said.**

1 **A. I believe it's Keander Early (phonetic).**

2 Q. Okay. All right. Okay. And after this
3 April 2015 message, did the union ever issue any
4 other statements to members about social media
5 policies?

6 **A. We may have.**

7 Q. Okay. But you don't know?

8 **A. I -- I don't -- I don't recall. I wasn't**
9 **the only one who wrote articles about, you know,**
10 **what was happening within the union.**

11 Q. Okay. Now, do you know of anyone else who
12 would know, for the time you were president, who --
13 or whether the union made any statements about
14 social media policies?

15 **A. Again, if there is someone who has**
16 **reviewed all twice-a-month Unity updates that went**
17 **out during my presidency, they might know.**

18 Q. Okay. Now, is it correct that after your
19 -- your communications with Mike Hafner and Naomi
20 Hudson in the early part of 2015, that the union's
21 communications with Southwest management about the
22 enforcement of the social media policies, in a
23 broad sense, just stopped?

24 **A. They didn't continue the way that I had**
25 **hoped that they would.**

1 Q. Okay. But, again, apart from maybe
2 specific grievances and those communications, were
3 there no further communications at a high level?

4 **A. There was a transition that took place**
5 **amongst -- with Mike Hafner, and he transitioned**
6 **out of his position and there was a changeover in**
7 **leadership. And the communications with the new**
8 **leadership was on a list of things that had been**
9 **ongoing. And she just wasn't -- didn't appear to**
10 **be a priority to sit down and continue the**
11 **communications after Hafner vacated his position.**

12 Q. Okay. And when -- after Sonya Lacore
13 became VP of inflight, were there any
14 communications whatsoever about the social media
15 policies between Local 556 and Southwest?

16 **A. Yes.**

17 Q. Okay. And what were those communications?

18 **A. They were part of our regular meetings**
19 **with inflight leadership on, you know, wanting to**
20 **continue to sit down and try to address changes.**
21 **It had been my hope -- and I had expressed that to**
22 **Hafner -- that we could try to look at how the**
23 **social media policy would be applied specifically**
24 **to our work group. And I expressed that to Sonya**
25 **and other leaders, but there wasn't a**

1 **follow-through on -- on continuing those**
2 **discussions.**

3 Q. Okay. Now, apart from your involvement as
4 the union president, did anyone else from Local
5 556's leadership participate in those discussions
6 with Southwest management?

7 **A. There were -- the high level or the -- any**
8 **discussions on the -- I just want to clarify which**
9 **conversations. There were conversations happening**
10 **amongst grievance specialists related to grievances**
11 **that were ongoing within the union. So there were**
12 **conversations that always took place regarding**
13 **grievances.**

14 Q. So outside of the grievance specialist,
15 starting there, what -- what -- who else
16 participated in those communications at the high
17 level?

18 **A. I believe that it was discussed at points**
19 **during our monthly executive board meetings.**
20 **Various members of inflight leadership would attend**
21 **and we would typically have a list of topics; some**
22 **that were base-specific, some that were general we**
23 **were seeing throughout the system. And all board**
24 **members had an opportunity to speak to inflight**
25 **leadership regarding any concerns that had been**

1 **brought forward by members.**

2 Q. Okay. What were some of the general
3 concerns that were discussed in those meetings?

4 **A. About social media or in general?**

5 Q. About social media policies.

6 **A. I believe that we discussed that we had**
7 **seen an -- what appeared to be an increase in**
8 **flight attendants being disciplined under the**
9 **social media policy.**

10 Q. And was that the -- I guess, was that an
11 increase in -- in discipline in the year 2015?

12 **A. I think, beginning the end of 2014 and**
13 **going into the first part of 2015.**

14 Q. Okay. And, I guess, after, say, the first
15 half of 2015, did you have meetings about those
16 same general concerns, about there being an
17 increase in social media policy discipline?

18 **A. No. In the second half of 2015, my focus**
19 **was on bargaining.**

20 Q. Okay. And did anybody else from Local 556
21 meet with management about the social media
22 policies in the second half of 2015?

23 **A. Generally, no, not to my knowledge. But,**
24 **again, the grievance team members were regularly in**
25 **communication with Southwest Airlines leadership on**

1 **any grievance-related issues that could have**
2 **included social media cases.**

3 Q. Okay. And outside of the grievance
4 specialists -- and you -- do you know if any -- any
5 other union leaders were having those conversations
6 with Southwest management?

7 **A. Not to my knowledge.**

8 Q. Okay. And to your knowledge, were they
9 having those -- having any of those communications
10 with Southwest management after 2015?

11 **A. Not -- not to my recollection.**

12 Q. Okay. Now, do you recall what
13 communications the grievance specialists were
14 having in 2015 with Southwest management about
15 social media policy discipline?

16 **A. I wasn't a part of conversations that the**
17 **individual grievance specialist had. It was their**
18 **responsibility to both file the grievance and**
19 **communicate directly with Southwest Airlines labor**
20 **on the details of the grievance and to try to**
21 **negotiate settlements on behalf of the flight**
22 **attendants.**

23 Q. Did the grievance specialists have any --
24 well, let's strike that and start again.

25 Did the grievance specialists ever

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1 communicate any, I guess, trends they were seeing
2 in -- in discipline under the social media
3 policies?

4 **A. Communicate to who?**

5 Q. The executive board.

6 **A. The grievance chairperson normally**
7 **attended the executive board meeting and presented**
8 **a grievance committee report that would include**
9 **breakdowns of discipline across the board; would**
10 **usually list statistics on what -- how many new**
11 **grievances had been filed, how many had been**
12 **settled, how many had been withdrawn and what the**
13 **-- the topics were.**

14 MR. GREENFIELD: And, Mr. Gilliam, we
15 will be providing Brandon Hillhouse on -- on some
16 of those specifics later this afternoon.

17 MR. GILLIAM: Okay. All right.

18 Q. (By Mr. Gilliam) And, Ms. Stone, do you
19 recall the -- the grievance chair doing that
20 throughout the duration of your -- your presidency?

21 **A. Yes.**

22 Q. Okay. All right. Now, do you recall
23 Southwest issuing a read-before-fly in 2017 about
24 social media policy violations?

25 **A. I recall them issuing a read-before-fly.**

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1 **I don't recall exactly when it was.**

2 Q. Okay. And do you recall if the Southwest
3 management had any communications with the union
4 executive board before issuing its read-before-fly
5 memos about social media policy violations?

6 **A. No, I don't recall if there was**
7 **communication to the executive board. Depending on**
8 **the -- the topic, they would -- they might notify a**
9 **particular committee chairperson, if it related to**
10 **their committee, before a communication went out.**

11 Q. Okay. All right. And do you know what
12 the digital media team is?

13 **A. Yes.**

14 Q. And what is the digital media team?

15 **A. It was a group of flight attendants**
16 **systemwide throughout all domiciles who were**
17 **brought in to assist the negotiating team as part**
18 **of our ongoing education efforts to communicate and**
19 **educate our membership regarding the status of**
20 **negotiations, where to go to get information**
21 **regarding negotiations, progress that we were**
22 **making in negotiations, but to do it via the**
23 **digital platform.**

24 They were also there to help the
25 negotiating team with any campaigns we wanted to do

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1 **digitally. For instance, if we were going to do a**
2 **campaign where we were going to tweet something or**
3 **have people change their profile pics in support of**
4 **something going on in negotiations, they were there**
5 **to help the negotiating team communicate that**
6 **message out to the membership digitally.**

7 Q. Okay. Now, this was a union group, wasn't
8 it?

9 **A. Yes.**

10 Q. Okay. And you mentioned they -- well, I
11 -- I may misstate this, so correct me if I am
12 wrong. Someone -- they would help coordinate if
13 somebody wanted to change their profile pic?

14 **A. No. It was if the union -- specifically,**
15 **the negotiating team -- was going to do any type of**
16 **campaign around our contract negotiations, and we**
17 **wanted a coordinated effort amongst the membership**
18 **to have something displayed that was in support of**
19 **negotiations or union around support of contract**
20 **negotiations. They were there to help us**
21 **communicate that, be the first to -- to do it; and**
22 **then assist anybody, you know, in even the**
23 **technical side of -- of how do you -- how -- how --**
24 **you know, how do you do that.**

25 Q. Okay. I think you mentioned something

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1 about changing profile pics?

2 **A. Yes.**

3 Q. And who -- who would change their profile
4 pics as part of, I guess, the negotiating team
5 strategy or --

6 **A. Whatever members chose to -- chose to do**
7 **that; whatever flight attendants elected to**
8 **participate in that.**

9 Q. Okay. And they -- they would change their
10 profile pic on Facebook?

11 **A. Yes.**

12 Q. Okay. All right. And was there a -- I
13 guess, was there a leader of the digital media
14 team?

15 **A. There -- yes, there was a liaison between**
16 **the negotiating team and the digital media team.**

17 Q. And who was the liaison?

18 **A. Sam Wilkins.**

19 Q. Okay. And was there a central group
20 within the digital media team to coordinate between
21 the flight attendants at all of the bases?

22 **A. No. I believe that was -- that was**
23 **coordinated through Sam, as well as one of our**
24 **communications committee members, our**
25 **cochairperson, Eric Schwenk.**

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1 Q. Okay. Now, was there a group of flight
2 attendants who were disciplined for posting,
3 hashtag Gary, sign now, at some point?
4 **A. I don't recall that there was a group of**
5 **flight attendants, no.**
6 Q. Okay. Do you remember if there were any
7 individual flight attendants who were disciplined
8 for -- for posting, hashtag, Gary sign now?
9 **A. Yes.**
10 Q. Okay. And who -- who was that flight
11 attendant?
12 **A. I believe it was Casey Rittner.**
13 Q. Okay. And do you know if there were any
14 other flight attendants who were disciplined for
15 that?
16 **A. I don't -- I don't recall.**
17 Q. Okay. Do you know if the -- if there was
18 a digital media team campaign using that strategy
19 of having people put, hashtag, Gary sign now, on
20 their pages?
21 **A. Yes.**
22 Q. Okay. And how -- how did that start?
23 **A. How did what start?**
24 Q. That campaign.
25 **A. It was part of our strategic bargaining**

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1 **campaign with contract negotiations.**
2 Q. Okay. And was that -- did that campaign
3 start before the first tentative agreement was
4 ratified?
5 **A. The first tentative agreement wasn't**
6 **ratified.**
7 Q. I am sorry. Rejected.
8 **A. No.**
9 Q. Okay. When -- when did that campaign
10 begin?
11 **A. That -- that campaign began after we had**
12 **returned to the bargaining table, the negotiations**
13 **-- after negotiations resumed following the**
14 **rejected TA.**
15 Q. Okay. And did that -- did flight
16 attendants continue using that -- hashtag, Gary
17 sign now -- through the ratification of the second
18 tentative agreement?
19 **A. No.**
20 Q. Okay. When did that stop?
21 **A. I don't recall the specific time frames.**
22 **We would -- we would -- we would do strategic**
23 **actions around certain time periods, many of them**
24 **were not ongoing.**
25 Q. Okay.

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1 **A. Some were just for a special occasion.**
2 Q. Okay. And do you remember when this
3 particular, Gary sign now hashtag, campaign
4 stopped?
5 **A. I don't recall when it stopped. I don't**
6 **believe it was running for very long.**
7 Q. Okay. Do you know why -- well, who made
8 the decision to stop it?
9 **A. The negotiating team made decisions**
10 **regarding our strategic campaign.**
11 Q. Okay. Do you know why the negotiating
12 team decided to stop the -- the, Gary sign now,
13 campaign?
14 **A. Because of the next steps that we took in**
15 **bargaining.**
16 Q. Okay. And what were those next steps?
17 **A. Southwest wasn't willing to agree to a**
18 **comprehensive tentative agreement that we had**
19 **proposed and wanted to go back through and continue**
20 **to bargain and -- and make changes in different**
21 **articles.**
22 Q. Okay. When was it that the union proposed
23 the comprehensive collective bargaining agreement?
24 **A. I believe it was the end of 2015.**
25 Q. Okay.

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1 **A. May have been early 2016.**
2 Q. Okay. And do you know if the union still
3 has a digital -- digital media team?
4 **A. Not to my knowledge, no.**
5 Q. Okay. And did the -- I guess, was the
6 digital media team in existence the whole time
7 while you were president?
8 **A. No.**
9 Q. And why did it end?
10 **A. It shifted. We -- during the rollout of**
11 **the second tentative agreement, the union actually**
12 **formed a Facebook group where any member could join**
13 **and ask questions and have their questions answered**
14 **by a union member regarding any -- any questions**
15 **they had about the tentative agreement, voting on**
16 **the tentative agreement, things like that.**
17 Q. Okay. And what was that Facebook group
18 called?
19 **A. The Official TWU Local 556 Facebook Group.**
20 Q. Okay. All right. And did the digital
21 media team have its own Facebook group when it was
22 around?
23 **A. No, not to my knowledge.**
24 Q. All right. Shifting gears a little bit
25 here. Do you know what a religious accommodation

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1 request is?

2 **A. I believe so, yes.**

3 Q. Okay. And what is it?

4 **A. I think it's when someone comes forward --**
5 **a member comes forward and requests to not pay dues**
6 **due to their religious beliefs.**

7 Q. Okay. Now, have you -- are you familiar
8 with religious accommodation requests in the
9 workplace?

10 **A. A little bit.**

11 Q. Okay. Do you know if any Southwest flight
12 attendants ever asked the union to assist it with a
13 religious accommodation in the workplace?

14 **A. Yes.**

15 Q. Okay. And what do you recall that
16 instance?

17 **A. I recall that there was one flight**
18 **attendant who had approached one of our national**
19 **officers while they were in -- the flight attendant**
20 **was in training for Southwest Airlines and was a**
21 **candidate, and had asked if we provided religious**
22 **accommodations for members.**

23 Q. Okay. And, I guess, what was the union's
24 response to that individual?

25 **A. That -- I wasn't present for the**

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1 Q. Okay. And what -- what -- what are you --
2 what do you recall?

3 **A. That there was a flight attendant who**
4 **requested an exception regarding their uniform many**
5 **years ago, back before we had a dress -- a dress or**
6 **a skirt option because they -- their religion --**
7 **she wanted to wear a dress or a skirt due to**
8 **religious reasons. And we didn't have one at that**
9 **time in our uniform.**

10 Q. Okay. And do you know if the flight
11 attendant was granted that exception?

12 **A. I believe so because she wore a skirt.**

13 Q. Okay. Now, has the union ever assisted
14 any flight attendants with, I guess, a request of
15 that nature, wanting an exception because of their
16 religious beliefs?

17 **A. Not to my knowledge, no.**

18 Q. Okay.

19 **A. Not that I am aware of.**

20 Q. Okay. Are you aware of any flight
21 attendants who have requested to wear a hijab
22 because of their religious beliefs?

23 **A. I believe there are some, but I wasn't**
24 **involved or don't have knowledge to the specifics**
25 **of their situation.**

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1 **conversation, but I believe that officer told the**
2 **individual that he would need to look into it and**
3 **get back to him. And reminded him that he would**
4 **not be responsible for paying dues until he**
5 **successfully completed probation because, under our**
6 **contract, that's when a flight attendant became a**
7 **member.**

8 Q. Okay. Now, are you aware of any situation
9 where a flight attendant has made a request of the
10 company that they, I guess, be given some exception
11 under a work rule because of their religious
12 beliefs?

13 **A. Exceptions for what?**

14 Q. I guess, for instance, if a flight
15 attendant doesn't want to fly on a particular day
16 because of her religious beliefs, are you familiar
17 with any -- any flight attendant who has sought an
18 exception to Southwest's general rules because of
19 those religious beliefs?

20 **A. I believe so.**

21 Q. Okay. And you believe that a flight
22 attendant has sought that sort of exception from
23 the company?

24 **A. Yes. Not -- not familiar with work**
25 **schedule, but an exception, yes.**

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1 Q. Okay. Now, would -- to the extent that
2 the union is involved in -- in those sorts of
3 issues, would -- who would get involved?

4 **A. Depending on -- it would depend on who the**
5 **flight attendant first brought it to. It could be**
6 **their domicile executive board member. It could be**
7 **that they reach out to the civil and human rights**
8 **committee. It could be that they reach out to the**
9 **working women's committee -- well, now WISE. It**
10 **would just depend on who the flight attendant**
11 **brought that to. They may call the union office,**
12 **just the general union line, and bring it forward**
13 **to whichever member answered the call.**

14 Q. Okay. And do you know if the civil and
15 human rights committee ever addressed those
16 religious accommodation issues in a general way?

17 **A. I am not aware of them addressing**
18 **religious accommodations.**

19 Q. Okay. All right. Now, do you know if a
20 flight attendant has ever, I guess, brought --
21 well, let me -- let me start over.

22 Has a flight attendant ever sought the
23 union's assistance for a complaint that he or she
24 had that her religious beliefs were being
25 discriminated against?

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1 **A. Not that I am aware of --**

2 Q. Okay.

3 **A. -- or that I recall.**

4 Q. Okay. And if anyone with the -- the union
5 would have knowledge of that, who would it be?

6 **A. I honestly don't know. I am not aware of**
7 **any of those requests being made to the union**
8 **during -- during my time.**

9 Q. Okay. And, earlier, you mentioned the
10 term "grievance specialist." And I just want to
11 clarify. What is a grievance specialist?

12 **A. A grievance specialist is a flight**
13 **attendant and a TWU Local 556 member who typically**
14 **works full-time in our union office. They handle**
15 **the day-to-day filing and processing of all**
16 **grievance (sic) on behalf of our flight attendants.**

17 Q. And how many grievance specialists does
18 Local 556 have?

19 **A. Currently, I don't know.**

20 Q. Okay. While you were president, how many
21 grievance specialists did Local 556 have?

22 **A. I believe we had approximately 13 flight**
23 **attendants that were full-time on our grievance**
24 **team; some that were grievance specialists and some**
25 **that just -- they were part of the grievance team,**

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1 **but just answered phone calls and assisted flight**
2 **attendants with questions.**

3 Q. Okay. Was Becky Parker a grievance
4 specialist?

5 **A. At one time, yes. She was also our**
6 **grievance chairperson.**

7 Q. Okay. All right. And does a grievance
8 specialist ever get involved in a -- I guess, an
9 investigation of a flight attendant's conduct
10 before the grievance is actually filed?

11 **A. The grievance specialists themselves don't**
12 **typically. Someone from our grievance team would**
13 **assist the flight attendant in securing union**
14 **representation for any meeting that Southwest**
15 **Airlines management had requested.**

16 Q. Okay. Now, when a -- when a flight
17 attendant is represented in an investigation,
18 before any discipline is ever issued, does the
19 representative have certain information they have
20 to report back to the grievance team?

21 **A. Yes. They are requested to take notes of**
22 **the fact-finding meeting; that's the meeting**
23 **between the flight attendant and members of**
24 **Southwest Airlines management. The representative**
25 **is -- again, they are required to document that**

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1 **meeting and submit notes to the union for that**
2 **flight attendant.**

3 Q. Okay. Now, is the representative asked to
4 provide any other information back to the grievance
5 team as part of the representation?

6 **A. Just any -- if there were any other**
7 **documents that Southwest Airlines provided, the**
8 **flight attendant copies those, or any other**
9 **information that Southwest Airlines provided. Or**
10 **if the flight attendant provided Southwest Airlines**
11 **documentation of something they were asking about,**
12 **then the representative was always asked to get a**
13 **copy and also provide the union office with copies**
14 **of any of those documents that either side may have**
15 **presented.**

16 Q. Okay. And what does the grievance team do
17 with that information when they receive it from the
18 representative?

19 **A. There -- there is a grievance database, so**
20 **notes are recorded in the database; and, like, when**
21 **the meeting is scheduled, who the rep is scheduled**
22 **for. And then after the meeting, the fact-finding**
23 **meeting notes are uploaded into the database, as**
24 **well as any supporting documentation that was**
25 **provided, the grievance specialist would be**

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1 **responsible for uploading that and -- into the**
2 **grievance database.**

3 Q. Okay. And who has access to that
4 database?

5 **A. Everybody on the grievance team -- all**
6 **flight attendants on the grievance team have access**
7 **to it. The executive board has access to it. And**
8 **there are some committee chairs that have access to**
9 **it. Or at least did during the time I was there; I**
10 **can't speak to who has access to it now.**

11 Q. Okay. And during the time you were there,
12 which committee chairs had access to that database?

13 **A. The grievance committee chairperson.**

14 Q. And which other committee chairs?

15 **A. The safety committee chairperson because**
16 **they were also on the executive board. So any --**
17 **any chair position that was filled by an executive**
18 **board member would have -- they would have**
19 **automatically had access to the database as well.**

20 Q. Okay. And what other chairs had access to
21 the database while you were president?

22 **A. I believe the grievance chairperson may**
23 **have been the only one that wasn't also a board**
24 **member --**

25 Q. Okay.

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1 A. -- that had access to it.
2 Q. And who was the safety committee chair at
3 the time you were president?
4 A. Michael Massoni.
5 Q. Okay.
6 A. There were other chairpersons, again, that
7 were also executive board members, so they would
8 have had -- he was an -- one -- an example I was
9 giving.
10 Q. Okay.
11 A. The -- are you -- are you asking me to
12 list all the specific chairpeople that were also
13 executive board members that had it? I'm just
14 trying to clarify your question. I want to make
15 sure I am answering accurately.
16 Q. No. If -- I guess, just to clarify, were
17 there any committee chairs who were not executive
18 board members who had access?
19 A. Besides the grievance --
20 Q. Besides --
21 A. -- chairperson?
22 Q. -- the grievance --
23 A. Not -- not that I can recall.
24 Q. Okay. All right. Let's see.
25 MR. GILLIAM: I may be ready to move

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1 on to some of the other topics that are -- that
2 would be covered by some of the other people you
3 mentioned, Adam. Oh, I think you are muted.
4 MR. GREENFIELD: Yup. Sorry about
5 that. Say that one more time. My apologies.
6 MR. GILLIAM: Yeah. I was just saying
7 that I think that I am probably about ready to move
8 on to some of the other topics that are, you know,
9 I guess, better -- you know, that are designated
10 for someone else. I --
11 MR. GREENFIELD: Okay.
12 MR. GILLIAM: -- I guess I -- I may
13 have other topics for Ms. Stone.
14 MR. GREENFIELD: Okay. Do you -- do
15 you know what those topics might be? Because we
16 would like to release the witness, if we can.
17 MR. GILLIAM: Okay. Can we go off the
18 record for just a minute?
19 MR. GREENFIELD: Of course.
20 (Recess taken.)
21 Q. (By Mr. Gilliam) Ms. Stone, can you hear
22 me? Are you back?
23 A. I can. And I -- while we were on break, I
24 want to clarify -- thought of something I wanted to
25 clarify.

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1 Q. Okay.
2 A. Regarding -- I believe you asked if there
3 was -- related to the question of leaders --
4 specific leaders of the DMT. And I had given the
5 name Sam Wilkins and the cochairperson of our
6 communications committee, Eric Schwenk.
7 Q. Yes.
8 A. There was also -- she was not the leader,
9 but we also had a -- had, for a brief time, a
10 professional digital media person that was not a
11 member of 556 that was also assisting Sam and Eric
12 and the members of the DMT.
13 Q. Okay. And who was that person?
14 A. Beth Becker.
15 THE REPORTER: I'm sorry, say it
16 again.
17 THE WITNESS: Beth Becker.
18 Q. (By Mr. Gilliam) And Beth Becker was not
19 a flight attendant?
20 A. That's correct, yes.
21 Q. Okay. All right.
22 A. And she -- I believe she -- she had, I
23 believe, a Facebook group that she utilized to
24 communicate with the DMT and -- with the DMT.
25 Q. Okay. And was that a private Facebook

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1 group?
2 A. Yes.
3 Q. Okay. And what did they communicate about
4 in that private Facebook group?
5 A. It was utilized to let them know if we
6 were going to be needing their help on launching a
7 digital campaign. To -- to the best of my
8 recollection, that's -- it was -- was a
9 communication tool to talk about the -- upcoming
10 campaigns.
11 Q. Okay. Do you know if they ever discussed
12 the recall petition in that Facebook group?
13 A. I don't know. Not -- I don't believe so.
14 Q. Okay. And as president, did you have
15 access to that Facebook group as well?
16 A. Yes.
17 Q. Okay. All right. Did any members of
18 Southwest management have access to that group?
19 Probably not.
20 A. No. Not to my knowledge.
21 Q. Okay. All right. Well, shifting gears a
22 little bit, what -- what communications did the
23 executive board have about Ms. Carter prior to her
24 termination?
25 A. I don't recall the executive board having

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1 any communications about Ms. Carter.

2 Q. Okay. Did anyone from the executive board
3 ever have any communications with Thom McDaniel
4 about Ms. Carter?

5 A. Not that I'm aware of. Not that I'm aware
6 of. Yeah, not that I recall.

7 Q. Okay.

8 A. And I -- again, I don't recall any
9 communications with the executive board. I believe
10 there was one communication from the treasurer
11 informing some of us that she had requested to stop
12 her COPE deduction.

13 Q. Okay. Did anybody from the executive
14 board ever have any communications with Don Shipman
15 about Carter prior to her termination?

16 A. Not that I am aware of.

17 Q. Okay. Let's see. If I could direct you
18 to Document 26. And I guess this will be marked as
19 Exhibit 22.

20 THE REPORTER: Did you want to mark 17
21 as 22 when you talked about it earlier?

22 MR. GILLIAM: No.

23 THE REPORTER: Okay.
24 (Exhibit 22 marked.)

25 A. Okay.

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1 Q. (By Mr. Gilliam) And do you recognize
2 this?

3 A. Yes.

4 Q. And what is it?

5 A. It's the email I just spoke about where
6 Ms. Carter was requesting of our treasurer to stop
7 her contributions to Committee on Political
8 Education.

9 Q. Okay. And going, I guess, down to the
10 first response from John Parrott on November 16th,
11 2013; do you see where I am?

12 A. Yes.

13 Q. Okay. And it says, she has been
14 supporting the thing she despises this entire time.

15 Did -- did the executive board know
16 what political causes she -- she despised?

17 A. The executive board -- I don't know of any
18 knowledge the executive board had regarding her
19 political causes.

20 Q. Okay. And Cuyler Thompson responds, this
21 just made my morning.

22 Did -- so Cuyler Thompson knew who she
23 was prior to this email, correct?

24 A. Yes.

25 Q. Okay. And how did Cuyler Thompson know

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1 who Audrey Stone (sic) was?

2 MR. GREENFIELD: Objection. Calls for
3 speculation. But if you can answer, go ahead,
4 Audrey.

5 A. I heard, how did Cuyler Thompson know who
6 Audrey Stone was.

7 Q. (By Mr. Gilliam) I'm sorry. How did
8 Cuyler Thompson know who Charlene Carter was?

9 A. Cuyler had been doing union work a lot
10 longer than I had. He had been involved with 556
11 at this point for a very, very long time; over a
12 decade. So I don't -- I don't know how or what
13 capacity he -- he knew of Ms. Carter.

14 Q. Okay. Had the executive board ever
15 discussed Charlene Carter in the context of her
16 suggesting a potential decertification of Local
17 556?

18 A. No. Not -- to my knowledge, the executive
19 board had not discussed that.

20 Q. Okay. Let's see. And you have an email
21 in this chain that says, PS, for those of you who
22 know and love it, making my queso dip this
23 afternoon.

24 Were you -- were you referring to
25 anything there apart from queso dip?

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1 A. No, I wasn't.

2 Q. Okay. So that's not a euphemism of some
3 kind?

4 A. No. I had a queso dip I frequently made
5 and took up to the union office that people really
6 enjoyed eating.

7 Q. Okay. And Brett Nevarez says, yum to
8 queso dip. So typical batshit/dipshit cannot read
9 her paycheck.

10 And did you know who batshit/dipshit
11 was?

12 A. I -- no. I -- I assumed that he was
13 speaking to -- speaking about Ms. Carter because I
14 believe she had already opted out of the union
15 itself at this point and didn't realize she was
16 still contributing to COPE.

17 Q. And had -- have you heard Brett Nevarez
18 refer to her at any other time as batshit/dipshit?

19 A. Batshit/dipshit, no.

20 Q. Okay. Have you ever heard Brett at any
21 other time refer to Ms. Carter as batshit?

22 A. Yes.

23 Q. Okay. And when was that?

24 A. I don't recall when it was.

25 Q. Okay. Was it on multiple other occasions?

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1 A. I don't recall. I don't recall when I
2 heard him use it.

3 Q. Okay. And then at the very top, there is
4 an email from Todd Gage that says, I wish you could
5 give her a list of all the campaigns she has
6 donated to in the last 17 years.

7 So what -- what campaigns did the COPE
8 money specifically go to?

9 A. The Committee on Political Education
10 funds, those were managed and those decisions were
11 made by TWU International. So some of the funds
12 went to -- the ones I am familiar with -- the
13 no-knives campaign that ran in 2012 when there was
14 discussion that they were going to relax the
15 restrictions about what could be carried on
16 aircrafts; and that it would include that certain
17 items that were viewed as weapons, certain knives
18 below certain sizes, were going to be allowed.
19 Items that had been banned since 2011.

20 TWU International, I know, utilized
21 COPE funds to support that campaign, along with
22 other airlines and union -- airline union groups.
23 And TWU International would utilize COPE funds to
24 support candidates running for office that they
25 believed were labor friendly and were going to

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1 support workers and workers' rights; those were
2 some of the examples.

3 Q. Okay. Do you know if COPE money was ever
4 specifically used to support candidates who
5 supported women's rights?

6 A. I -- I don't know for certain. I -- I
7 don't know. I don't have a list of specific
8 candidates or the issues that they supported that
9 International donated to. They could -- they could
10 have.

11 Q. Did -- did the International communicate
12 with the Local about what causes they supported?

13 A. Sometimes they did. Sometimes they asked
14 the Local to participate in -- in campaigns. They
15 would ask us to email things to our members asking
16 for their participation. If, you know, they needed
17 to contact their congressman, for instance, on
18 issues that International was either supporting or
19 was, you know, trying to stop.

20 Q. What -- what specific things do you
21 remember International asking Local 556 to
22 participate in?

23 A. There were -- at one point, I believe,
24 there was something going on with railroad changes.
25 There was potential legislation that was going to

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1 take -- take work away from union members in the
2 railroad industry. So they would ask -- I believe
3 they asked our support to have our members contact
4 -- contact their rep- -- their elected
5 representatives to stop that change.

6 There were some pieces of legislation
7 around the FAA Reauthorization Act that we
8 partnered with International and other airline
9 unions in supporting; so changes with that. There
10 -- there, I know, was something regarding the Right
11 to Work Foundation at one point that International
12 had emailed out and had asked of us to participate
13 in as well of stopping something that was going to
14 take workers -- workers' rights or voices away.

15 Q. Okay. Do you remember the International
16 ever asking Local 556 to participate in causes that
17 did not specifically involve transportation?

18 A. I don't recall. Most of the ones I can
19 think of affected -- affected members within
20 Transportation Workers Union, but not all of the
21 members within TWU are directly in the --
22 transportation-related job.

23 Q. What other causes do you recall
24 International asking Local 556 to participate in?

25 A. I don't recall any other specific --

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1 specific causes.

2 Q. Okay. Do you know if COPE --

3 MR. GREENFIELD: And -- and, Matthew,
4 we're starting to get a bit far afield. But I -- I
5 understand where you are asking from the 30(b)(6)
6 Notice on Topic Number 18, but I believe it's --
7 it's -- 18 is asking about the function of COPE in
8 relationship to and communications and activities
9 concerning abortion, reproductive freedom, Planned
10 Parenthood, the march on Washington and any
11 complaints or court's investigations or decisions
12 about flight attendants' violations or alleged
13 violations of the social media policy.

14 So I have given you a little bit of
15 leeway, but we are starting to get pretty far
16 afield from -- from that topic.

17 MR. GILLIAM: Well, my next question
18 is --

19 Q. (By Mr. Gilliam) So are you familiar if
20 COPE ever contributed any money to Planned
21 Parenthood?

22 MR. GREENFIELD: There we go.

23 A. No. No, not to my knowledge. No.

24 Q. (By Mr. Gilliam) Okay. All right. Now,
25 did Local 556 ever have any direct communications

1 in a formal way with Planned Parenthood?
2 **A. No, we did not.**
3 Q. Okay. All right. Let's see. Also like
4 you to reference Document 28. If we could mark
5 this as 23, Exhibit 23.
6 (Exhibit 23 marked.)
7 **A. 28, correct?**
8 Q. (By Mr. Gilliam) Yes, Document 28.
9 **A. Okay.**
10 Q. Have you had the chance to review this?
11 If you need a moment, that's fine.
12 **A. Yes, please. Thank you.**
13 Q. Sure.
14 MR. GREENFIELD: Mr. Gilliam, what
15 topic is -- is this falling under?
16 MR. GILLIAM: Well, I believe 11, but
17 also 17.
18 MR. GREENFIELD: Okay.
19 **A. Okay.**
20 Q. (By Mr. Gilliam) Do you recognize this?
21 **A. No. Just looking at it right now, but,**
22 **no.**
23 Q. Okay. Now, this appears to be an email
24 from Brett Nevarez to you, Chad Kleibschedel,
25 Andrew Longan and John Parrott. Who is Chad

1 Kleibschedel, if I am saying that correctly?
2 **A. He is the current first vice president. I**
3 **do not believe this was an email that was sent to**
4 **him, I believe. It's autopopulate from when --**
5 **whenever this was pulled based off of the union**
6 **email address.**
7 Q. Okay. So, yeah, I don't quite follow. Is
8 this a distribution group that it was sent to?
9 **A. No. Looking at the from, it says it's**
10 **from Brett Nevarez, but the email address is from**
11 **vicepresident2@twu556.org. All of our email**
12 **addresses within 556, you could access it either**
13 **via our first initial, last name or by the actual**
14 **position of the person. I believe that whenever**
15 **this document was pulled, it's showing the first**
16 **vice president email address; that position is now**
17 **being held by Chad Kleibschedel. He was not in**
18 **that position in February of 2014.**
19 Q. Okay. So instead of Chad Kleibschedel,
20 who would have received this message as first vice
21 president in 2014?
22 **A. Todd Gage.**
23 Q. Okay. And who is Andrew Longan?
24 **A. He is a flight attendant now.**
25 Q. Okay. Do you know if -- well, did -- did

1 Andrew Longan hold an office with the union in
2 2014?
3 **A. No.**
4 Q. Okay. Do you know why Andrew Longan would
5 be receiving this message?
6 **A. Again, I believe it's just the timing of**
7 **an auto -- of when this document was -- was pulled.**
8 **I don't believe he received this email in 2014.**
9 Q. Okay. And the email says, Cuyler's
10 favorite is threatening to decert now that she is
11 not a member and cannot be charged.
12 And I believe this document, when it
13 was produced, was followed by the post on the -- is
14 it the third page or second page? There is a post
15 by Charlene Carter. I think you mentioned that you
16 don't really recall this email. Is there -- so I
17 assume where it says, I will approach International
18 after the five of us have decided on a course of
19 action, you don't know what that's referring to, do
20 you?
21 **A. No.**
22 Q. Do you know who would have that
23 information?
24 **A. I would assume Brett Nevarez. And I am --**
25 **I am just -- I am assuming that just based off of**

1 **what he wrote and that he was speaking to the TWU**
2 **Constitution.**
3 Q. Okay. And I am sorry. Why do you think
4 he is referring to the TWU Constitution?
5 **A. Because he says he'll approach**
6 **International; and there is -- there is language in**
7 **the TWU Constitution about attempts to decertify.**
8 Q. Okay. Can you be charged under the
9 International Constitution for threatening to
10 decertify?
11 **A. I don't believe so. I think you actually**
12 **have to be a member of the union, but I have not**
13 **reviewed the Constitution lately.**
14 Q. Okay. All right. Now, what -- what does
15 the health committee do?
16 **A. The TWU Local 556 health committee works**
17 **closely with our safety committee to address any**
18 **concerns that come up related to flight attendant**
19 **health. They communicate with membership about any**
20 **issues related to health. And, again, they work**
21 **very closely with the safety committee.**
22 Q. Okay. Now, is -- does the health
23 committee get involved in any issues pertaining to
24 women's reproductive health?
25 **A. No.**

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1 Q. What is the civil and human rights
2 committee?
3 **A. Civil and human rights committee is a**
4 **committee that is there to promote civil and human**
5 **rights. Being inclusive, any diversity issues that**
6 **are brought forward; items like that.**
7 Q. And what does it do to promote civil and
8 human rights?
9 **A. There are different activities that the**
10 **civil and human rights committee has participated**
11 **in. Some partnering with TWU International; some,**
12 **for instance, around Martin Luther King Day;**
13 **participating in some of the -- the LGBT parades.**
14 **Those are an example of some of the activities that**
15 **the civil and human rights committee participated**
16 **in.**
17 Q. Okay. Has the civil and human rights
18 committee ever been involved in any investigations
19 into flight attendants' social media policies?
20 **A. No, not to my knowledge.**
21 Q. Okay. And to ask a similar question: Has
22 -- are -- are you aware of any disciplinary issue
23 under any of the social media policies that have
24 involved the sort of issues that the civil and
25 human rights committee work on and has, I guess,

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1 involved them?
2 **A. The committee itself, not to my knowledge,**
3 **no.**
4 Q. Okay.
5 **A. Not that I -- not that I recall.**
6 Q. Okay. And was the civil and human rights
7 committee involved in the union's participation in
8 the women's march?
9 **A. The chairperson of the civil and human**
10 **rights committee was -- was -- attended the meeting**
11 **that was held that week, as well as the march, yes.**
12 Q. Okay. And who was the chairperson?
13 **A. Lori Lochelt.**
14 Q. Okay. Did the civil and human rights
15 committee have any other involvement in the women's
16 march activities that occurred that week?
17 **A. Not that I am aware of. But, again, I**
18 **didn't -- I didn't set up that -- I wasn't in**
19 **charge of the working women's committee that took**
20 **place that week.**
21 Q. Okay. Was that Jessica Parker that was
22 involved in that?
23 **A. Yes.**
24 Q. Okay. And has the civil and human rights
25 committee participated in any activities that

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1 involved Planned Parenthood?
2 **A. No.**
3 Q. Okay.
4 **A. Not to my knowledge.**
5 Q. Okay. And has the education committee
6 participated in any events that involved Planned
7 Parenthood?
8 **A. No.**
9 Q. Okay. Okay.
10 MR. GILLIAM: I think that's -- that's
11 it for now for Ms. Stone.
12 MR. CLOUTMAN: Is she released,
13 Mr. Gilliam?
14 MR. GILLIAM: Yes. Do you have
15 somebody specific to cover document collection and
16 that -- those issues?
17 MR. CLOUTMAN: Document collection?
18 MR. GILLIAM: Yeah.
19 MR. CLOUTMAN: To the extent -- to the
20 extent it's not privileged, yes, sir.
21 MR. GILLIAM: Okay. All right.
22 MR. GILLESPIE: Okay. Thank you. So
23 is the witness released?
24 MR. GILLIAM: Yes.
25 MR. CLOUTMAN: Thank y'all.

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1 MR. GILLESPIE: Thank y'all. Y'all
2 have a good afternoon. Don't have too much fun.
3 MR. CLOUTMAN: Promise.
4 (End of Proceedings, 12:58 p.m.)
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1 CHANGES AND SIGNATURE
2 WITNESS NAME: AUDREY STONE
3 DATE OF DEPOSITION: NOVEMBER 30, 2020
4 PAGE LINE CHANGEREASON

5 _____
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25 _____

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1 REPORTER'S CERTIFICATION
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE NORTHERN DISTRICT OF TEXAS
4 DALLAS DIVISION
5 CHARLENE CARTER)
6)
7) CIVIL ACTION NO.
8 VS.) 3:17-CV-02278-X
9)
10)
11) SOUTHWEST AIRLINES CO., AND)
12) TRANSPORT WORKERS UNION OF)
13) AMERICA, LOCAL 556)

14 -----
15 CONFIDENTIAL
16 TWU LOCAL 556 30(b)(6)
17 DEPOSITION OF AUDREY STONE
18 NOVEMBER 30, 2020
19 (REPORTED REMOTELY)
20 -----

21 I, CHARIS M. HENDRICK, Certified Shorthand
22 Reporter in and for the State of Texas, do hereby
23 certify to the following:
24 That the witness, AUDREY STONE, was by me
25 duly sworn and that the transcript of the oral
deposition is a true record of the testimony given
by the witness.
I further certify that pursuant to Federal
Rules of Civil Procedure, Rule 30(e)(1)(A) and (B)
as well as Rule 30(e)(2), that review of the
transcript and signature of the deponent:
__xx__ was requested by the deponent and/or a

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1 I, AUDREY STONE, have read the foregoing
2 deposition and hereby affix my signature that same
3 is true and correct, except as noted above.
4

5 _____
6 AUDREY STONE

7 THE STATE OF _____
8 COUNTY OF _____

9 Before me, _____, on this day
10 personally appeared AUDREY STONE, known to me (or
11 proved to me under oath or through _____) to
12 be the person whose name is subscribed to the
13 foregoing instrument and acknowledged to me that
14 they executed the same for the purposes and
15 consideration therein expressed.

16 Given under my hand and seal of office this _____
17 day of _____, 2020.

18 NOTARY PUBLIC IN AND FOR THE
19 STATE OF _____

20 MY COMMISSION EXPIRES: _____
21
22
23
24
25

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1 party before completion of the deposition.
2 _____ was not requested by the deponent and/or
3 a party before the completion of the deposition.

4 I further certify that I am neither
5 attorney nor counsel for, nor related to or
6 employed by any of the parties to the action in
7 which this deposition is taken and further that I
8 am not a relative or employee of any attorney of
9 record in this cause, nor am I financially or
10 otherwise interested in the outcome of the action.

11 The amount of time used by each party at
12 the deposition is as follows:

13 Mr. Gilliam - 2:43 hours/minutes
14

15 Subscribed and sworn to on this 8th day of
16 December, 2020.

17 _____
18 CHARIS M. HENDRICK, CSR # 3469
19 Certification Expires: 10-31-21
20 Bradford Court Reporting, LLC
21 7015 Mumford Street
22 Dallas, Texas 75252
23 Telephone 972-931-2799
24 Facsimile 972-931-1199
25 Firm Registration No. 38



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